



U.S. Department of Justice

Rachael S. Rollins
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300 State Street, Suite 230
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October 31, 2022

By Email

Elaine Pourinski
13 Old South Street
Northampton, MA 01060

Re: United States of America v. Benjamin Shacar
Criminal No. 21-30028

Dear Attorney Pourinski:

I am responding to your question regarding whether the Government intends to disclose additional materials in this matter. I have reviewed the past productions provided on June 3, 2021, March 3, 2022, and April 7, 2022 and the Government's response, dated April 4, 2022, to your letter dated March 21, 2022. Based on this, I believe the government has provided the materials required by Fed. R. Crim. P. 16 and Rules 116.1(c) and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts.

I am unaware of additional outstanding discovery materials. If you believe there are certain items that the Government is required to provide which you have not received *and* which the Government has not previously declined to provide, please advise me of such.

Sincerely,

/s/ Neil L. Desroches
NEIL L. DESROCHES
Assistant United States Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Neil L. Desroches
NEIL L. DESROCHES
Assistant United States Attorney